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6 *Attorney for Plaintiff*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 MALINDA SLATON, an individual,
10

11 Plaintiff,

12 vs.

13 L.L.O. INC., d/b/a ACME ELECTRIC, a domestic
corporation; INTERNATIONAL BROTHERHOOD
14 OF ELECTRICAL WORKERS LOCAL UNION
357, a domestic not for profit corporation; DOES I
15 through X, inclusive; ROE CORPORATIONS I
through X, inclusive,

16 Defendants.
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CASE NO: 2:17-cv-01561-RFB-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTIONS AND FOR
DEFENDANT TO REPLY**
(Second Request)

19 COMES NOW, Plaintiff MALINDA SLATON, (hereinafter, "SLATON"), by and
20 through her attorney of record Trevor J. Hatfield of the law firm of Hatfield & Associates, Ltd.,
21 and L.L.O. INC., d/b/a ACME ELECTRIC's (hereinafter "ACME ELECTRIC) and do hereby
22 stipulate and agree to an extension of time (Second Request) for Plaintiff to respond to
23 Defendant's following Motions:

- 24
- 25 1. Motion for Summary Judgment on Breach of Contract Claim (ECF #51) filed on August 8,
26 2019 – Response due on August 29, 2019; 1st Extension Response due September 5, 2019.
 - 27 2. Motion for Summary Judgment on Title VII Claim (ECF #52) filed on August 9, 2019 –
28 Response due on August 30, 2019; 1st Extension Response due September 6, 2019.

1 3. Third Motion for Partial Summary Judgment to Limit Plaintiff's Categories of Damages
2 (ECF #53) filed on August 12, 2019 – Response due on September 2, 2019; 1st Extension
3 Response due September 10, 2019.

4 4. Motion to Strike Jury Demand or, in the Alternative, to Bifurcate Liability and Damages
5 Phases of Trial (ECF #54 and ECF #55) filed on August 13, 2019 – Response due on
6 August 27, 2019; 1st Extension Response due September 3, 2019.

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8 This request is made due to additional unforeseen professional and personal attentions of
9 Plaintiff's counsel. As responses are required for the Motions, the last one being due on September
10 10, 2019, the parties have agreed to extend the response time for each of the Motions one week
11 from each of the respective due dates. Defendant's replies to Plaintiff's responses will also be
12 extended by one week respectively.

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14 This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the
15 parties' second request for an extension of the time for the parties to respond to the various motion
16 response deadlines. Accordingly, Plaintiff's proposed response dates and Defendant's proposed
17 reply dates shall be as follows:

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<u>Document Number</u>	<u>Proposed Response Due Date</u>	<u>Proposed Reply Due Date</u>
1. Motion - ECF #51	September 12, 2019	October 3, 2019
2. Motion – ECF #52	September 13, 2019	October 4, 2019
3. Motion – ECF #53	September 17, 2019	October 7, 2019
4. Motion – ECF #54 and ECF #55	September 10, 2019	September 24, 2019
Dated this 4 th day of September 2019.		
HATFIELD & ASSOCIATES, LTD.		
Dated this 4 th day of September 2019.		
HOLLEY DRIGGS, WALCH FINE WRAY PUZEY & THOMPSON		
<i>/s/ Trevor J. Hatfield</i>		
<i>/s/ F. Thomas Edwards</i>		
By: _____	By: _____	
Trevor J. Hatfield, Esq.	F. Thomas Edwards, Esq., SBN 9549	
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(702) 388-4469 Tel.	Email: tedwards@nevadafirm.com	
Email: thatfield@hatfieldlawassociates.com	<i>Attorneys for Defendant L.L.O. Inc. d/b/a Acme</i>	
<i>Attorney for Plaintiff</i>	<i>Electric</i>	

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 5th day of September, 2019.

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CERTIFICATE OF SERVICE

I certify that on the 4th day of September 2019, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT’S MOTIONS AND FOR DEFENDANT TO REPLY (Second Request)** with the Clerk of the Court by using the ECF system.

Dated this 4th day of September 2019.

By: /s/ Freda P. Brazier
An employee of Hatfield & Associates, Ltd.